

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

LIVINGSCAPES, LLC } Case No. 3:20-bk-03561
3941 STEWARTS LANE } Chapter 11
NASHVILLE, TN 37218 } Judge Harrison

Debtor

JOINT MOTION TO EXTEND DEADLINE TO CONFIRM PLAN

COME NOW, the Debtor, through counsel, Creditor Cassie Burton, through counsel, Creditor Milessa Thomas, through counsel, and Party-In-Interest Robert Waldschmidt (“the Movants”), and jointly move this Honorable Court to extend the deadline to confirm the Chapter 11 Plan pursuant to 1129(e) of the Code to March 1, 2022. The above-referenced creditors and party-in-interest have filed objections to confirmation of the Chapter 11 Plan, and have already agreed to continue the Confirmation Hearing to March 1, 2022 to allow additional time to see if a consensual resolution can be reached. Therefore, the Movants are seeking to extend the deadline to confirm a Chapter 11 Plan accordingly.

WHEREFORE, the Movants respectfully move the Court to grant this motion by entering an Order extending the deadline as set forth in the proposed agreed order submitted contemporaneously herewith.

Respectfully Submitted,

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AND

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AND

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AND

/s/ROBERT WALDSCHMIDT (W/ PERMISSION)
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CERTIFICATE OF SERVICE

I hereby certify that I have sent a true and exact copy of the foregoing to the Assistant United States Trustee; and all other parties of record to receive notice electronically via the United States Bankruptcy Court's CM/ECF system, on February 4, 2022

/S/ STEVEN L. LEFKOVITZ
Steven L. Lefkovitz